

ALLTEL CORPORATION

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EX PARTE OR LATE FILED
October 1, 2001

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TW-A235
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 01-206, DA 01-2033
Notice of Permitted *Ex Parte* Presentation
2001 Annual Access Tariff Filings of ALLTEL Telephone
Systems

Dear Ms. Salas:

ALLTEL Telephone Systems ("ALLTEL" of the "Company"), by its attorney, hereby notifies the Commission of a permitted *ex parte* discussion between the undersigned, Jeffrey Reynolds of Parrish, Blessing and Associates, a consultant engaged by ALLTEL, and Cesar Caballero, Staff Manager – Wholesale Services for ALLTEL and the following FCC staff members; Jane Jackson, Chief of the Competitive Pricing Division, Rich Lerner, Deputy Chief of the Competitive Pricing Division, Jim Lichford of the Tariff and Pricing Analysis Branch, Raj Kannan of the Competitive Pricing Division and Jennifer McKee of the Competitive Pricing division (by telephone). This discussion took place today October 1, 2001. An original and two copies of the instant filing are submitted pursuant to Section 1.1206(b) of the Commission's rules.

The subject of the discussion was the investigation of ALLTEL's access rates as filed in the 2001 annual access tariff filing and, in particular, ALLTEL's willingness to enter into further discussions with the interexchange carriers and the Commission to resolve the issues outstanding in this investigation. While ALLTEL continues to believe that its filing was in compliance with the Commission's rules it also recognizes that an expeditious resolution is in the best interest of all parties to this proceeding.

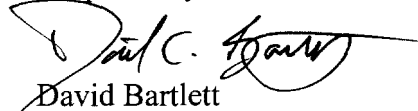
ALLTEL's discussion focused on those ALLTEL study areas that had significant increases in interstate local switching rates from the prior year. In addition, ALLTEL indicated that while some companies had significant percentage increases, because of low levels of demand the overall impact to access customers was nominal. A copy of the material discussed is attached.

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ALLTEL agreed to meet with the interexchange carriers to resolve the outstanding rate issues in the very near term. ALLTEL further agreed to apprise the FCC of the status of those discussions.

Please contact the undersigned counsel should you have questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David C. Bartlett", written over a horizontal line.

David Bartlett
Assistant Vice President
Federal Regulatory Affairs
601 Pennsylvania Avenue
Suite 720
Washington, D.C. 20004

Attachment

Cc: Jane Jackson
Rich Lerner
Jim Lichford
Raj Kannan
Jennifer McKee

In the Matter of

2001 ANNUAL ACCESS TARIFF FILINGS
CC Docket No. 01-206

Ex parte presentation of ALLTEL Telephone Systems, Inc.

Overview

1. ALLTEL's rates as originally filed are legal and comply with the Commission's Rules
2. Reviewed AT&T's concerns and found that they are primarily rate related. Their linear regression approach is overly simplistic
3. Many components drive the development of local switching rates – investment, expenses, and demand – all established prospectively
4. ALLTEL is prepared to meet with AT&T and make reasonable modifications to their interstate local switching rates in order to close the investigation

ALLTEL LS Rates – 2000 and 2001 Annual Filings

Local Switching Rates

	/1/2000	7/1/2001 as filed	Percent
ALLTEL Alabama	\$ 0.00671	\$ 0.01056	57%
ALLTEL Arkansas	\$ 0.00812	\$ 0.00827	2%
ALLTEL Carolina - No	\$ 0.00427	\$ 0.00570	33%
ALLTEL Florida	\$ 0.00582	\$ 0.00562	-3%
ALLTEL Kentucky	\$ 0.00737	\$ 0.00917	25%
ALLTEL Mississippi	\$ 0.00492	\$ 0.00608	24%
ALLTEL Missouri	\$ 0.00881	\$ 0.00842	-4%
ALLTEL Pennsylvania	\$ 0.00799	\$ 0.00689	-14%
ALLTEL South Carolina	\$ 0.00549	\$ 0.00597	9%
Georgia	\$ 0.00652	\$ 0.00700	7%
New York Properties	\$ 0.00731	\$ 0.00611	-16%
Oklahoma Properties	\$ 0.00918	\$ 0.00868	-6%
Sugar Land Tel	\$ 0.00728	\$ 0.00558	-23%
Texas ALLTEL	\$ 0.00787	\$ 0.01092	39%
Western Reserve Tel	\$ 0.00855	\$ 0.00958	12%

ALLTEL LS Demand

Study Area	Forecasted MOUs
ALLTEL Alabama	64,604,006
ALLTEL Carolina – No	766,290,544
ALLTEL Kentucky	62,381,960
ALLTEL Mississippi	33,288,734
Texas ALLTEL	66,637,262
Western Reserve Tel	607,521,286